

ELLEN F. ROSENBLUM
Attorney General
MARC ABRAMS, #890149
Assistant Attorney-in-Charge
ALLIE M. BOYD, #163478
Assistant Attorney General
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: marc.abrams@doj.state.or.us
allie.m.Boyd@doj.state.or.us

Attorneys for Defendant

Rebecca Cambreleng, OSB No. 133209
rebecca@workplacelawpdx.com
Ashley A. Marton, OSB No. 171584
ashley@workplacelawpdx.com
CAMBRELENG & MARTON LLC
3518 S. Corbett Ave.
Portland, Oregon 97239
Telephone: (503) 477-4899

Attorneys for Plaintiff

Meredith Holley(she/her), OSB No. 125647
Meredith@ErisResolution.com
Law Office of Meredith Holley
207 E 5th Avenue, Suite 254
Eugene, OR 97401
Phone: (458) 221-2671
Fax: (833) 352-3615

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

SOUTHERN DIVISION

LAURA HANSON,

Plaintiff,

v.

STATE OF OREGON LEGISLATIVE
ASSEMBLY,

Defendant.

Case No. 3:21-cv-00780-SI

JOINT NEUTRAL STATEMENT

The parties submit this Joint Neutral Statement, noting where they still have disagreements [defendant in **bold**; plaintiff in *italics*]:

Plaintiff Laura Hanson worked for defendant Oregon legislature between December 5, 2018, and October 7, 2020, as Chief of Staff for Senator Sara Gelser (now Gelser-Blouin). Ms. Hanson **says she** is a person with disabilities. **Defendant acknowledges plaintiff has PTSD.**

On December 10, 2019, by text, Ms. Hanson disclosed to Sen. Gelser that she had been diagnosed with attention deficit hyperactivity disorder (ADHD). On December 17, 2019, Ms. Hanson requested a “mental health day” *to deal with an urgent health need*. Defendant says Ms. Hanson was given leave on December 20, 2019, Ms. Hanson disputes whether leave was taken. Between December 20, 2019 and December 31, 2020, Ms. Hanson and Sen. Gelser texted, which led to a discussion of their working conditions. Sen. Gelser reported to human resources that Ms. Hanson called her work environment “toxic and abusive.” On January 2, 2020, Ms. Hanson emailed Director of Human Resources, Jessica Knieling, that she was concerned that some of what she was experiencing at work was retaliation for taking medical leave. Dir. Knieling referred the issue to an investigator as part of a legislative process known as Rule 27. The investigator, attorney Brenda Baumgart, assigned to the Rule 27 process, met with Ms. Hanson, and, based on Ms. Hanson’s January 2, 2020 email, initiated the Rule 27 process.

On January 6, 2020, defendant Legislature put Ms. Hanson on paid administrative leave **and home duty stationed** *requiring Ms. Hanson to turn in her phone and work computer, instructing her, “Stay at home during [] scheduled working hours,” and “Do not enter your workplace until further notice.”* Defendant says the leave was reasonable. Plaintiff says the leave was in violation of the law. **The issues were brought before the Senate Conduct Committee. The Committee met on July 15, 2020 but did not reach a decision that day. The Committee met again on October 7, 2020 and found no**

violation of Rule 27. *After a 10-month public process under Rule 27, on October 7, 2020, defendant terminated Ms. Hanson's employment. Defendant says the termination was for legitimate reasons. Plaintiff says the termination was retaliatory and in violation of the law.*

In December 2022, defendant hired Ms. Hanson again, this time working for Representative Khanh Pham as a legislative assistant. Ms. Hanson started work the week of January 3, 2023. Defendant terminated Ms. Hanson's employment on January 25, 2023. Defendant says it terminated Ms. Hanson for legitimate performance reasons. Plaintiff says the termination was in violation of the law.

DATED May 2, 2024.

Respectfully submitted,
ELLEN F. ROSENBLUM
Attorney General

s/ Marc Abrams
MARC ABRAMS, #890149
Assistant Attorney-in-Charge
ALLIE M. BOYD, #163478
Assistant Attorney General
Trial Attorneys
Tel (971) 673-1880
Fax (971) 673-5000
marc.abrams@doj.state.or.us
allie.m.boyd@doj.state.or.us
Attorneys for Defendant

Rebecca Cambreleng, OSB No. 133209
rebecca@workplacelawpdx.com
Ashley A. Marton, OSB No. 171584
ashley@workplacelawpdx.com
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Eugene, OR 97401
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Attorneys for Plaintiff